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June 5, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Maglie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

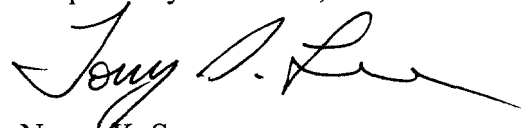
**Re: CenturyTel, Inc.
Petition for Waiver of 711 Implementation Rules
CC Docket No. 92-105**

Dear Ms. Salas:

On behalf of CenturyTel, Inc., transmitted herewith are an original and four (4) copies of its Petition for Waiver of the Commission's 711 Implementation Rules. Please date-stamp the extra copy of this filing and return it to us in the enclosed envelope.

Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned at (202) 424-7798.

Respectfully submitted,



Nancy K. Spooner
Tony S. Lee

Counsel for CenturyTel, Inc.

cc: Service List

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JUN 5 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
The Use of N11 Codes and Other Abbreviated) CC Docket No. 92-105
Dialing Arrangements)
)
)
_____)

PETITION FOR WAIVER

I. INTRODUCTION

CenturyTel, Inc. ("CenturyTel"),¹ by its undersigned attorneys and pursuant to Section 1.3 of the Commission's Rules, 47 C.F.R. § 1.3, respectfully requests a limited waiver of the Commission's 711 implementation requirements. Specifically, CenturyTel requests a waiver of Section 64.603 of the Commission's Rules, 47 C.F.R. § 64.603, until the fourth quarter of 2002, for a small, discrete portion of its network recently acquired from GTE that cannot be upgraded to handle 711 calls by the FCC's October 1, 2001 deadline.

CenturyTel has already embarked on an aggressive equipment replacement and upgrade program in its legacy exchanges in order to comply with the Commission's Telephone Relay Services ("TRS") requirements,² and the company fully intends to have more than 96% of its network prepared to meet the 711 implementation date set by the FCC. However, as reported to

¹ CenturyTel provides communications services, which include local exchange, wireless, long distance, Internet access and data services, to nearly three million customers in 21 states. CenturyTel is the eighth largest local exchange telephone company, based on access lines, and the eighth largest cellular company, based on population equivalents owned, in the United States.

² See generally, *Use of N11 Codes and Other Abbreviated Dialing Arrangements*, Second Report and Order, CC Docket No. 92-105 (rel. Aug. 9, 2000) (*711 Implementation Order*).

the Commission earlier this year,³ CenturyTel has identified five host switches and ten remote switching modules (RSMs) located in Wisconsin (out of its entire network of 430 host switches and RSMs in 21 states) that are incapable of handling 711 calls.⁴ These particular facilities are too primitive for any available upgrades, and must therefore be replaced. CenturyTel will not be able to implement 711 calling in areas served by these switches by the Commission's October 1, 2001 implementation date, and accordingly, files the instant Petition for Waiver.

As further detailed below, good cause exists for the FCC to grant the limited waiver requested herein. In support of this Petition, CenturyTel states as follows:

II. GOOD CAUSE EXISTS TO GRANT A LIMITED WAIVER OF THE COMMISSION'S RULES

Section 1.3 allows the FCC to waive its rules, and the TRS rules in particular, for "good cause" shown. Indeed, the Commission has previously issued waivers of TRS implementation rules for good cause in circumstances where petitioners were unable to effectuate standards by a Commission mandated deadline.⁵ CenturyTel's good faith efforts to execute the FCC's 711 requirements, and the unique circumstances presented by the need to replace and upgrade elements of its extensive network, warrant the grant of a limited waiver of Section 64.603. It is important to note that CenturyTel is not requesting a blanket rule waiver; rather, the company is

³ See CenturyTel Report to the Commission Pursuant to the *711 Implementation Order* (filed Feb. 12, 2001).

⁴ The switches are operated by two of CenturyTel's subsidiaries – CenturyTel of Central Wisconsin and Telephone USA.

⁵ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, DA 01-492, CC Docket No. 98-67 (rel. Feb. 23, 2001) (waivers granted to Sprint Communications Company L.P. until June 18, 2001, to comply with Section 64.604, and to the New Hampshire Public Utilities Commission, California Public Utilities Commission, and Arizona Commission for the Deaf and Hard of Hearing until June 18, 2001, to comply with Sections 64.603 and 64.604).

only requesting a waiver for discrete parts of its network until such time as certain switches can be replaced to handle 711 calls.

A. CenturyTel is Expending Significant Effort to Comply With the FCC's Implementation Deadline

CenturyTel has grown rapidly within the past several years, primarily through the acquisition of access lines purchased from other companies. CenturyTel operates a wireline telecommunications network that is comprised of 430 host switches and RSMs (collectively referred to hereinafter as "switches") of differing brands located throughout the United States. Among the types of switches used in its network are AGCS GTD-5, Lucent 5ESS, Nortel DMS-10 and DMS-100, Siemens EWSD and DCO, and Vidar switches. In order to comply with the FCC's *711 Implementation Order*, CenturyTel will have to upgrade certain switches with new software, or replace outdated switches that cannot be modified to accommodate 711 calls.

Due to the complexity of upgrading its many switches and other network elements to handle 711 calls, the availability of a limited pool of qualified employees and contractors, and the necessity of working within budgetary constraints, CenturyTel has developed a plan to carry out its switch-upgrade project over a two-year period. In order to comply with the Commission's 711 implementation date, CenturyTel has developed a "work-around" that will allow most of its subscribers to access TRS services through 711 calls by October 1, 2001.

Nearly all of CenturyTel's switches (415 out of 430 switches) support the "remote call forwarding" function, and as a result, these switches can be programmed to forward 711 calls to the appropriate TRS call centers. CenturyTel will institute such interim measures in each switch that supports remote call forwarding to allow the great majority of its subscribers to place 711 calls until a software patch can be applied to allow the switch to handle calls for TRS assistance. Thus, CenturyTel fully intends to comply with the FCC's 711 implementation date in nearly all

of the company's service areas during the ongoing process of upgrading equipment. However, as detailed below, a limited waiver is necessary for the 15 switches that cannot be upgraded to handle 711 calls, and for which interim compliance measures are unavailable.

B. A Limited Waiver is Necessary to Replace Certain Specific Switches that Cannot Be Upgraded

A small portion of CenturyTel's network in Wisconsin is comprised of recently acquired Vidar switches that are more than 20 years old. Specifically, CenturyTel has five Vidar host switches in its network that serve ten Vidar RSMs. Further information regarding the Vidar equipment is included in Exhibit A, attached hereto.⁶ Vidar equipment is no longer manufactured, and no new software or hardware is being created to support new functionalities for Vidar equipment.

CenturyTel purchased the network where these Vidar switches are located less than a year ago from GTE in September 2000 in a transaction that involved the acquisition of more than 120,000 access lines. At that time, a company known as American Digital Switching ("ADS") still supported Vidar switches. Although ADS, or a similar company, apparently developed upgraded components to handle both 411 and 911 calls,⁷ no solution was developed to permit Vidar switches to accept 711 calls. It is CenturyTel's understanding that ADS is now out of business, and CenturyTel has no knowledge of another company that can develop 711 capabilities for Vidar switches.

⁶ Exhibit A updates the Vidar replacement schedule filed with CenturyTel's Report to the Commission Pursuant to the *711 Implementation Order*.

⁷ Please note that some counties in Wisconsin have not yet instituted 911 calling, and therefore, some Vidar switches listed on Exhibit A were never upgraded to accommodate 911 dialing.

Moreover, the Vidar switches do not support remote call forwarding, and therefore, CenturyTel cannot utilize interim measures to provide 711 service over its Vidar equipment. Accordingly, there are no readily available means for CenturyTel to upgrade or devise a "work-around" for the Vidar switches, other than to replace them in their entirety.

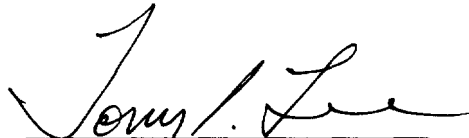
In order to meet the Commission's 711 requirements, CenturyTel is developing engineering plans for the replacement of the Vidar equipment utilizing the EWSD and 5ESS platforms. The company will be ordering replacement equipment from manufacturers in the near term; however, final information is not yet available regarding delivery and installation dates. CenturyTel has allocated an additional \$3,500,000 as part of its 2001/2002 capital budget for spending during 2002 to purchase replacement equipment. CenturyTel intends to replace the Vidar equipment located in the Laona, Wabeno, Spider Lake, Springbrook, and Stone Lake exchanges by the fourth quarter of 2001. It is anticipated that the remaining Vidar equipment in the Elmwood, Maiden Rock, Pepin, Plum City, Glenwood City, Colfax, Boyceville, Elk Mound, Knapp, and Wheeler exchanges will be replaced by the end of 2002.

III. CONCLUSION

CenturyTel is diligently working to complete a complex and extensive upgrade of its network to incorporate 711 capabilities throughout most of its network. CenturyTel will be able to institute an interim solution by the Commission's October 1, 2001 implementation date to handle 711 calls. However, the Vidar equipment deployed in certain Wisconsin exchanges recently acquired by CenturyTel is more than 20 years old, does not meet CenturyTel's standards, and cannot be upgraded or modified to comply with the FCC's *711 Implementation Order*. CenturyTel is in the process of ordering equipment to completely replace the Vidar platforms, though the company's ability to replace the equipment is limited by manufacturer,

manpower, and budgetary constraints. Accordingly, CenturyTel respectfully requests that, for good cause shown, the Commission grant a limited waiver of Section 64.603 to CenturyTel until December 31, 2002, to allow the company adequate time to replace the equipment as described herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tony S. Lee", written over a horizontal line.

Nancy K. Spooner

Tony S. Lee

Swidler Berlin Shereff Friedman, LLP

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Counsel for CenturyTel, Inc.

Date: June 5, 2001

EXHIBIT A

Vidar Replacement Schedule

Host Switch	Exchange	Current Switch Type	New Host Location	Proposed Switch Type	Year of Replacement
Laona	Laona	VIDAR	Marinette	5ESS	4th Quarter 2001
	Wabeno	VIRSS	Marinette	5ESS	4th Quarter 2001
Hayward	N/A				
	Spider Lake	VIRSS	Rice Lake	EWSD	4th Quarter 2001
	Springbrook	VIRSS	Rice Lake	EWSD	4th Quarter 2001
	Stone Lake	VIRSS	Rice Lake	EWSD	4th Quarter 2001
Elmwood	Elmwood	VIDAR	Rice Lake	EWSD	by 4th Quarter 2002
	Maiden Rock	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
	Pepin	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
	Plum City	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
Glenwood City	Glenwood City	VIDAR	Rice Lake	EWSD	by 4th Quarter 2002
Colfax	Colfax	VIDAR	Rice Lake	EWSD	by 4th Quarter 2002
	Boyceville	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
	Elk Mound	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
	Knapp	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002
	Wheeler	VIRSS	Rice Lake	EWSD	by 4th Quarter 2002

CERTIFICATION

On behalf of CenturyTel, Inc., I hereby certify under penalty of perjury that I have read the foregoing Petition for Waiver, and that the statements contained therein are true and correct to the best of my knowledge or belief, and are made in good faith.



John F. Jones
Vice President, Government Relations
CenturyTel, Inc.

May 31, 2001
Date

CERTIFICATE OF SERVICE

I, Tony S. Lee, an attorney with the law firm Swidler Berlin Shereff Friedman, LLP, hereby certify that a true a correct copy of the foregoing Petition for Waiver was served via hand delivery on the following:

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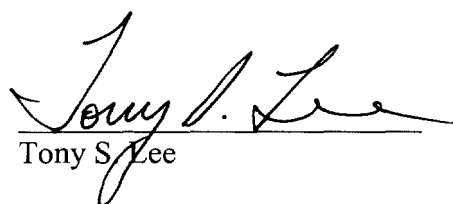
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